

Last Updated: November 10, 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

James J. Mawo X

Plaintiff,

against

NYCDOE, Marie Guillaume X

Defendant.

CIVIL ACTION NO.:
19-CV-04372 (GBD)(KHP)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 8-9-19
DATE FILED: 8-9-19

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PROPOSED CASE MANAGEMENT PLAN FOR PRO SE CASE

1. Summary of Claims, Defenses, and Relevant Issues.

Plaintiff/Defendant (circle one)

Plaintiff brings this action alleging race discrimination in violation of Title VII, the SHRL, & the CHRL.

2. I understand my obligation to and am preserving relevant information.

Plaintiff/Defendant (circle one)

3. Proposed Schedule

All discovery should be completed by May 14, 2020

- a. Depositions: Depositions shall be completed by Apr 13, 2020
- b. Neither party may take more than 10 depositions. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.

c. Initial Requests for Documents must be made by September 25, 2019

d. Responses to Requests for Documents must be made by October 25, 2019

e. Documents from third-parties (such as doctors) will/will not (circle one) be required. If required, the following are the third-parties from whom Documents will be requested.

f. Subpoenas requesting Documents from third-parties must be served by November 15, 2019. Documents obtained from third-parties must be provided to all parties in this matter.

g. There will/will not (circle one) be expert testimony in this case. If expert testimony will be needed, please describe the topic on which the expert(s) is expected to testify

4. Early Settlement or Resolution

The parties have/have not (circle one) discussed the possibility of settlement. The parties request a settlement conference by no later than April 14, 2020. The following information is needed before settlement can be discussed:

5. Other Matters

Plaintiff(s)/Defendant(s) (circle one) wish to discuss the following additional matters at the Initial Case Management Conference.

Respectfully submitted this 7th day of August, 2019

James Mauro

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